

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

WOLLMUTH MAHER & DEUTSCH LLP

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(Admissions *pro hac vice* pending)

PROPOSED ATTORNEYS FOR DEBTOR

In re:

LTL MANAGEMENT LLC,¹

Debtor.

LTL MANAGEMENT LLC,

Plaintiff,

v.

THOSE PARTIES LISTED ON APPENDIX A TO
COMPLAINT and JOHN AND JANE DOES 1-1000,

Defendants.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan

Adv. No.: 23-01092 (MBK)

NOTICE OF APPEARANCE IN ADVERSARY PROCEEDING

PLEASE TAKE NOTICE that pursuant to section 1109 of title 11 of the United States

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

Code, 11 U.S.C. § 101 *et seq.*, and Rules 2002, 3017, 9007 and 9010 of the Federal Rules of Bankruptcy Procedure, LTL Management LLC, Plaintiff in the above-captioned adversary proceeding, appears through its proposed co-counsel, Wollmuth Maher & Deutsch LLP, and requests service of all notices and documents herein upon

James N. Lawlor, Esq.
Wollmuth Maher & Deutsch, LLP
500 Fifth Avenue, 12th Floor
New York, New York 10110
(212) 382-3300
jlawlor@wmd-law.com

Counsel also requests that all ECF/electronic notices be sent to jlawlor@wmd-law.com.

PLEASE TAKE FURTHER NOTICE that the foregoing request for service includes all pleadings of any kind, including, without limitation, all notices, applications, motions, complaints, and orders, whether written or oral, formal or informal, however transmitted or conveyed, related in any way to the above-captioned Plaintiff, its property, or its estate.

PLEASE TAKE FURTHER NOTICE that neither this *Notice of Appearance in Adversary Proceeding* (the “Notice”) nor any later appearance, pleading, proof of claim, claim, or suit shall constitute a waiver of (i) the right to have final orders in noncore matters entered only after *de novo* review by a District Judge, (ii) the right to trial by jury in any proceeding triable in these cases or any case, controversy, or proceeding related to these cases, (iii) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) any objection to the jurisdiction of this Bankruptcy Court for any purpose other than with respect to this Notice, (v) an election of remedies, or (vi) any other rights, claims, actions, defenses, setoffs, or recoupments as appropriate, in law or in equity under any agreements, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Dated: April 5, 2023
New York, New York

Respectfully submitted,

WOLLMUTH MAHER & DEUTSCH LLP

/s/ James N. Lawlor

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Proposed Attorneys for LTL Management LLC